

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEMS PRODUCTS LIABILITY
LITIGATION

Master File No. 2:12-MD-02327
MDL 2327

ETHICON WAVE 12 CASES LISTED IN
EXHIBIT A

JOSEPH R. GOODWIN
U.S. DISTRICT JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF
EDWARD STANFORD, M.D. FOR WAVE 12**

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motion and memorandum filed in relation to Edward Stanford, MD for Ethicon Election Wave re PTO 298 Dkt. 7349 (inadvertently styled Wave 8). Plaintiffs respectfully request that the Court exclude Edward Stanford's testimony, for the reasons expressed in the Election Wave re PTO 298 briefing. This notice applies to the following Wave 12 cases identified in Exhibit A attached hereto.

Dated: October 29, 2019

Respectfully submitted,

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EXHIBIT A

| | |
|---|---------------|
| Acosta, Margaret | 2:17-cv-02702 |
| Baker, Judy | 2:12-cv-09496 |
| Bloom, Lynne | 2:17-cv-01960 |
| Boomhower, Paula | 2:13-cv-14886 |
| Britt, Judy | 2:13-cv-01947 |
| Bush, Teresa | 2:13-cv-01937 |
| Chavez, Maria Bertha | 2:13-cv-11240 |
| Cloutier, Deborah | 2:15-cv-11930 |
| Crow, Natalie | 2:14-cv-12908 |
| Dealba, Circe | 2:13-cv-19143 |
| Enborg, Terri | 2:13-cv-18734 |
| Epstein-Clark, Linda | 2:14-cv-14081 |
| Freeman, Terri | 2:13-cv-24578 |
| Frietz, Nadine | 2:14-cv-29513 |
| Getter, Dianne, Deceased | 2:13-cv-07222 |
| Greenwell, Shirley | 2:13-cv-20166 |
| Grundel, Sharon | 2:13-cv-28247 |
| Hagler, Penney | 2:13-cv-19177 |
| Haymart, Jennifer | 2:14-cv-21296 |
| Henderson, Karan | 2:14-cv-18418 |
| Hervey, Susan, Personal Representative of Estate of Georgia Hervey, deceased | 2:12-cv-05839 |
| Hogge, Vivian | 2:12-cv-07873 |
| Kole, Kim | 2:18-cv-00291 |
| Lopez, Irma | 2:13-cv-16036 |
| Marston, Susan | 2:12-cv-09490 |
| Martin, Cheryl | 2:14-cv-00354 |
| Martinez, Nohemi | 2:13-cv-10804 |
| Mattox, Kristine | 2:13-cv-14913 |
| McBroom, Amanda | 2:15-cv-03043 |
| Mejia, Patricia | 2:15-cv-14436 |
| Moe, Debra | 2:13-cv-26408 |
| Morreira, Delia | 2:13-cv-01950 |
| Munoz, Silvia | 2:17-cv-04361 |
| Pearson, Phyllis | 2:13-cv-03168 |
| Postil, Victoria | 2:12-cv-09486 |

| | |
|--------------------------|---------------|
| Price, Renie | 2:16-cv-12548 |
| Reyna, Kathy | 2:14-cv-14089 |
| Siefkas, Patricia Hughes | 2:13-cv-20168 |
| Skinner, Brenda Diane | 2:15-cv-07789 |
| Smith, Tabitha | 2:13-cv-21957 |
| Solano, Josie | 2:14-cv-14101 |
| Tidler, Dorothy Pauline | 2:14-cv-21299 |
| Valencia, Jasmine | 2:12-cv-05475 |
| Vigil, Hortencia | 2:14-cv-01060 |
| Webb, Kelly J. | 2:13-cv-03083 |

CERTIFICATE OF SERVICE

I hereby certify that on October 29, 2019, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

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